REMARKS

The foregoing amendment and the following arguments are provided generally to more particularly pointing out the claimed subject matter.

Claims 1, 3-9 and 13-34 have been rejected. Claims 2, 10-12 have been previously cancelled. Claims 17 and 23 have been cancelled without prejudice. Claims 1, 3-9, 13, 18-21, 24-25, 28-34 have been amended. Claim 35 has been newly added. Reconsideration and withdrawal of the rejections set forth in the Office Action dated February 20, 2008 are respectfully requested. Support for the amended claims is found in the specification, the drawings, and in the claims as originally filed. No new matter has been added.

Telephonic Interview Summary Statement

A telephonic interview was conducted between the Examiner Thanh Ha T. Dang, and applicant's representative, Yenyun Fu. The undersigned representative wishes to thank Examiner Dang for the telephonic interview conducted on April 15, 2008. During the interview, the 35 U.S.C. §101 rejection to claim 29 was discussed. Further, the proposed claim amendments to independent claim 1 were briefly discussed (and such amendment is reflected in the section "Amendments to the Claims" listed above) in reference to the cited art Huang (U.S. 2002/0147748 A1).

In particular, differentiation in Huang's usage of meta-tags and applicant's usage of meta-tags were emphasized. Examiner Dang inquired about the innovative aspects of the applicant's invention and in response recommends that applicant explicitly incorporate language related to semantic abilities in the independent claim body. As such, applicant has incorporated such language in independent claims 1 and 29. The Examiner has indicated that an updated search will be performed.

Applicant thanks the Examiner for considering and entering the amendments submitted herein. No particular agreement was reached during this interview.

Claim Objections
Claims 3 and 13

The Examiner has objected to claims 3 and 13 because of alleged informalities. Applicant has made the appropriate changes.

35 U.S.C. §101 Rejections
Claim 29-34

The Examiner has rejected claim 29 under 35 U.S.C. §101 because the claimed invention is allegedly directed to non-statutory subject matter. Claims 30-34 are dependent on claim 29 and thus have also been rejected by the Examiner.

Although applicant respectfully disagrees, independent claim 29 has nonetheless been amended for the purposes of expediting prosecution and that such amendments have rendered the Examiner's basis for rejection no longer applicable. Applicant respectfully submits that claims 29-34 are directed to statutory subject matter.

The withdrawal of the rejections under 35 U.S.C. §101 is thus respectfully requested for claims 29-34.

35 U.S.C. §103 Rejections
Claims 1, 3-9 and 13-34

The Examiner has rejected claims 1, 3-9 and 13-34 under 35 U.S.C. 103(a) as being allegedly unpatentable over Huang et al., (U.S. Pub. No. 2002/0147748, hereinafter "Huang") in and further in view of Skeen et al., (U.S. Patent No. 7,284,196, hereinafter "Skeen"). Applicant respectfully disagrees.

The cited references do not show each and every element as recited in the independent claim 1

Applicant respectfully submits that the cited references Huang and Skeen, when viewed alone or in combination, do not show the subject matter recited in the pending claims.

"To establish *prima facie* obviousness of a claimed invention, all
the claim limitations must be taught or suggested by the prior art.
In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)."

*The cited references do not disclose meta-tags to semantically represent attributes for
specifying "an access policy of the semantic object" representing the target entity (Claim 1)*

Applicant's independent claims 1 and 29 include claimed subject matter neither taught nor
suggested by the references considered alone or in combination. Therefore, Applicant's
independent claims are patentable over the references.

For example, in claim 1:

1. A method of semantically representing a target entity, the method comprising:

   identifying a set of meta-tags in the target entity to <u>semantically represent a
set of attributes</u> associated with the target entity in a semantic object;

   wherein, the set of attributes comprises at least **one attribute for
specifying an access policy of the semantic object** representing the target entity;

   wherein a type of the target entity is one of a ...;

   receiving a metadata entry ...;

   wherein, the metadata entry semantically represents an attribute ...;

   wherein one or more of the metadata entry and the meta-tag is definable
with an ontology for **enabling semantic access** to the target entity;

   wherein the target entity is **semantically identifiable** via one or more of
the meta-tag and the metadata entry associated with the semantic object

Reference 'Huang'

The Examiner states that "Huang teaches a method of semantically representing a target
... wherein the target is identifiable via one or more of the at least one of the meta-tags and the

metadata associated with the target" (Page 4 of Office Action mailed February 20, 2008). Applicant respectfully disagrees.

Huang discloses extensible style sheet designs using meta-tag formation (Title, Huang). The designed style sheet of Huang is for transferring content-oriented markup language files into a target file so as to support various presentations and information exchange. According to Huang, the meta-tag information pertains to information between dynamic objects in the target file and a source file (Abstract, Huang).

The meta-tags in Huang are limited to the purposes of "associating elements or source objects in a source file (e.g., an XML file) with certain dynamic objects in a target file (e.g., an HTML file)". (Huang, [0060]) In Huang, the inserted meta-tags in the target file "specifies a relationship to the corresponding source file". The meta-tags of Huang are used to generate an XSL file in reference to the target file. ([0014]-[0015])

The stated purpose of Huang's meta-tag is different from the claimed teachings of applicant's meta-tags. Applicant's meta-tags can be used to *semantically represent* attributes for specifying *an access policy* of the semantic object" representing the target entity. The claimed subject matter related to meta-tags is different from that of Huang's.

Huang does not describe, teach, or suggest using "meta-tags to *semantically represent* attributes for specifying *an access policy* of the semantic object" representing the target entity, as claimed by applicant in independent claim 1. Similar rationale and arguments can be applied to independent claim 29.

Further, Huang does not disclose metadata and/or meta-tags that are definable with an ontology. The Examiner acknowledges this. The Examiner states "Huang does not explicitly teach wherein one or more of the metadata and the at least one of the meta-tags are definable with an ontology." (Page 4 of Office Action mailed February 20, 2008)

Reference 'Skeen'

Skeen does not disclose or suggest the features/functionalities that (as discussed above) are missing from Huang. In particular, Skeen also does not teach or suggest the above-emphasized claimed subject matter of using "meta-tags to *__semantically represent__* attributes for specifying *__an access policy__* of the semantic object" representing the target entity, as claimed by applicant in independent claim 1.

Therefore, without admitting to the propriety of the combination as suggested by the Examiner, even if Huang and Skeen were combined, the resulting disclosure would be different from the subject matter disclosed by the applicant in independent claim 1, at least for the above stated reasons. Thus, applicant submits that independent claim 1 is patentable over Huang, Skeen, and over the combination of Huang and Skeen. Independent claim 29 is also patentable over Huang and/or Skeen for at least the above stated reasons. The withdrawal of the rejections under 35 U.S.C. §103(a) is respectfully requested for independent claims 1 and 29.

Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, applicant's silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim. Therefore, the remaining dependent claims are also patentable over the cited references. The withdrawal of the rejections under 35 U.S.C. §103(a) is respectfully requested for dependent claims 3-9 and 13-16, 18-22, and 24-34.
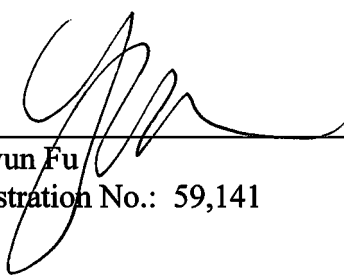
CONCLUSION

In light of the amendments and the preceding arguments, the applicant respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance.

If the Examiner believes that a conference would be of value in expediting the prosecution of this application, he is cordially invited to telephone the undersigned counsel at (650) 838-4306 to arrange for such a conference.

The Commissioner is authorized to charge $25.00 for the added dependent claim and any underpayment in fees to Deposit Account No. 50-2207.

Respectfully submitted,

Date: April 15, 2008

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